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Attorneys for Defendant
AMERICAN AIRLINES, INC.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IAN WILLIAMS,

Plaintiff,

vs.

AMERICAN AIRLINES, a private
corporation; GERARD ARPEY; JOHN
NEILLY; RICHARD WOODS; JEFF
O'MALLEY; DAVID TULL; MARK
KOSTRZEWA, RON DeLONG and Does 1
Through 20, Inclusive,

Defendants.

Case No. C 07-00540 CW

**STIPULATION AND ORDER TO
CONTINUE MEDIATION DEADLINE**

The Honorable Claudia Wilken

STIPULATION

WHEREAS, the United States District Court for the Northern District of California held a June 7, 2007 Case Management Conference in the matter of *Ian Williams v. American Airlines, et al.*, Case No. C 07-00540 CW and issued its Case Management Order on June 11, 2007, referring the matter to private mediation, to be held by October 11, 2007;

WHEREAS, on or about August, 2007, Defendant American Airlines served its Initial

1 Disclosures, Discovery Requests and Notice to Take Plaintiff's Deposition on September 24th and 25th,
2 2007;

3 **WHEREAS**, on September 12, 2007, following receipt of Defendant's above-referenced
4 Disclosures, Discovery Requests and Deposition Notice, Plaintiff Williams served Notice of the
5 unavailability of counsel between September 12th and September 24th, 2007, effectively and unilaterally
6 cancelling the deposition of Plaintiff, without making disclosures or responding to the Discovery
7 Requests;

8 **WHEREAS**, the parties cannot engage in a meaningful mediation session without the mutual
9 exchange of Initial Disclosures, and Defendant's require the receipt of responses to its discovery requests
10 and to first depose Plaintiff prior to mediation;

11 **WHEREAS**, Defendant is unable to complete deposition in the matter and review any discovery
12 responses which may be received prior to the October 11, 2007 deadline;

13 **WHEREAS**, the Parties believe that a continuance of the mediation deadline would best conserve
14 the parties' and judicial resources.

15 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, between the parties
16 that the October 11, 2007 mediation deadline shall be continued for at least 45 days to a date determined
17 by the Court thereafter.

18 **IT IS SO STIPULATED BETWEEN PARTIES.**

19 Dated: October 1, 2007

MORGAN, LEWIS & BOCKIUS LLP

20 By: /s/

21 L. Julius M. Turman
22 Attorneys for Defendant
American Airlines, Inc.

23 Dated: October 1, 2007

24 By: /s/

25 F. Anthony Edwards
26 Attorneys for Plaintiff
27 Ian Williams
28

1 **IT IS ORDERED THAT** the October 11, 2007 mediation deadline is continued to **12/13/07**.

2
3 Dated: October ²____, 2007



Hon. Claudia Wilken